

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

----- X
In re: : Chapter 7
:
JEFFREY WINICK : Case No. 20-11976 (SHL)
Debtor. :
:
----- X

**DOLP 655 PROPERTIES II LLC'S RESERVATION OF RIGHTS IN RESPONSE
TO TRUSTEE'S APPLICATION TO RETAIN MALTZ AUCTIONS, INC. AS
BROKER AND MARKETING AGENT TO MARKET AND SELL THE
DEBTOR'S ESTATE'S INTERESTS IN WINICK REALTY GROUP LLC
AND WTN REALTY CORP.**

In response to the Application to Employ Maltz Auctions, Inc., d/b/a Maltz Auctions as Broker and Marketing Agent to Market and Sell the Debtor's Estate's Interests in Winick Realty Group LLC and WTN Realty Corp. [Doc. 62, 63] (the "Application"), creditor and party-in-interest, DOLP 655 PROPERTIES II LLC ("DOLP 655"),¹ by and through its undersigned counsel, states as follows. Winick Realty Group LLC is subject to obligations owed to DOLP 655. The Trustee has yet to provide clarity on the proposed terms and structure of any marketing and sale contemplated in the Application and thus DOLP 655 reserves the right to object to any proposed sale or transfer put forth, especially any proposed sale or transfer of interest in Winick Realty Group LLC in which Winick Realty Group LLC does not remain subject to its existing obligations to DOLP 655.

¹ This response is submitted on the date hereof by consent of Trustee's counsel to extension of time to submit same.

Dated: New York, New York
May 25, 2021

ROSENBERG & ESTIS, P.C.

By: /s/ John D. Giampolo
John D. Giampolo

733 Third Avenue
New York, NY 10017
(212) 551-1273

Counsel for DOLP 655 PROPERTIES II LLC